

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED
APR 10 2025
CLERK, U.S. DISTRICT COURT
TEXAS EASTERN

JENNIFER RYAN,

Plaintiff,

v.

PAYPAL INC.,

Defendant.

CIVIL ACTION NO.: 4:22-cv-559

JURY TRIAL DEMANDED

**PLAINTIFFS' OBJECTION TO DKT. 69 AND SELECTIVE CONSIDERATION OF MOTIONS
& NOTICE OF RELATED LITIGATION**

TO THE HONORABLE JUDGE BILL DAVIS:

Plaintiff Jennifer Ryan, pro se, objects to the Court's April 9, 2025 Order (Dkt. #69), selectively considering only Dkts. #44 and #47, while disregarding multiple timely, relevant motions—Dkt. #48, #50, #52, #53, #54, #55, #57, #58, #59, #60, #62, #68—and the Second Amended Complaint (Dkt. #49), risking due process violations and unequal treatment.

I. OBJECTION TO SELECTIVE CONSIDERATION

1. Dkt. #69 limits review to Dkts. #44 and #47, Motions to Lift Stay, freezing 13 pending filings without ruling, denial, or acknowledgment—Dkt. #48–#68—constituting a *de facto* denial of Plaintiff's constitutional and procedural rights (Haines v. Kerner, 404 U.S. 519 (1972)).
2. Unaddressed filings—e.g., Dkt. #49 (constitutional claims, ¶¶ 27-28), Dkt. #58 (state actor), Dkt. #59 (waiver), Dkt. #60 (default)—raise First/Fifth Amendment violations, state action (Brentwood Academy v. Tennessee, 531 U.S. 288 (2001)), arbitration waiver (Morgan v. Sundance, 142 S. Ct. 1708 (2022)), and default (Rule 55(a))—critical to arbitrability and Plaintiff's claims.

3. Selective consideration—while excusing Defendant's 36-day silence (Dkt. #49, due March 17)—violates equal protection and due process—prejudicing Plaintiff. (*Lewis v. Lynn*, 236 F.3d 766 (5th Cir. 2001)).

II. REQUEST FOR RELIEF

Plaintiff requests:

1. Formal rulings on Dkt. #48, #50, #52, #53, #54, #55, #57, #58, #59, #60, #62, #68, and #49—or docket as denied—to preserve appeal rights (*Klay v. UnitedHealthgroup, Inc.*, 376 F.3d 1092 (11th Cir. 2004)).
2. Reconsideration of Dkt. #69's selective freeze. (*Mirant*, 613 F.3d 584 (5th Cir. 2010)).

III. NOTICE OF RELATED LITIGATION

Plaintiff notifies the Court of imminent litigation in Dallas County against PayPal, DOJ, FinCEN, and federal actors—alleging collusion, surveillance, unconstitutional deplatforming, defamation, and selective enforcement—mirroring Dkt. #49's claims. This notice preserves the record—selective consideration risks inconsistency with a parallel forum. (*Mitsubishi Motors Corp. v. Soler Chrysler-Plymouth, Inc.*, 473 U.S. 614 (1985))

Respectfully submitted,



Jennifer L. Ryan

469-491-0587

jennaryanrealty@gmail.com

Pro Se Plaintiff

CERTIFICATE OF SERVICE

I certify that on April 10, 2025, a true and correct copy of this Motion was served on all parties of record via CM/ECF and/or U.S. Mail.

/ s / Jennifer L. Ryan